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October 17, 2011

Ms. Kathleen Harder

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Subject: Sacramento Regional County Sanitation District's Additional Comments on the Tentative Order Amending Waste Discharge Requirements and Tentative Time Schedule Order for Sacramento Regional Wastewater Treatment Plant

Dear Ms. Harder:

The Sacramento Regional County Sanitation District (SRCSD) previously submitted comments in a letter dated October 5, 2011, on the tentative order amending waste discharge requirements for the Sacramento Regional Wastewater Treatment Plant (SRWTP) circulated for public comments on September 15, 2011. We have an additional comment on the sampling requirements for nitrogenous species.

SRCSD has consulted with its process consultant, Dr. Denny Parker of Brown and Caldwell, on treatment reliability with respect to ammonia removal. His expertise and written testimony were submitted in December 2010 for the Central Valley Regional Water Quality Control Board (Central Valley Water Board) hearing. As noted then, he had just completed an investigation for the Water Environment Research Foundation (WERF) on biological nutrient removal (BNR) and nitrification treatment plant performance reliability. The title of that report is "Nutrient Management Volume II: Removal Technology Performance & Reliability." This is the most comprehensive report available to date on treatment plant reliability and is accessible on the WERF website.

As noted during his testimony, the maximum daily permit limit for the SRWTP at 2.2 mg/L ammonia-N is among the most stringent in the nation and currently is met only by one plant in the survey. Dr. Parker based this on an analysis of the best performing plants in the nation, all of which use composite sampling (not grab sampling). He further advises that using grab sampling to represent the maximum day condition is conceptually incorrect because that instantaneous sample does not represent the performance (nor the impact) of the plant due to effluent quality variability throughout the day in nitrification and BNR plants. A flow weighted composite, on the other hand, properly represents the performance of the plant (i.e. representing a mass average of every part of the day). Dr. Parker also noted that to comply with a grab measure rather than a composite sample is an order of magnitude more difficult for a treatment process and that this will result in the design of many more treatment components having to be built at great additional expense

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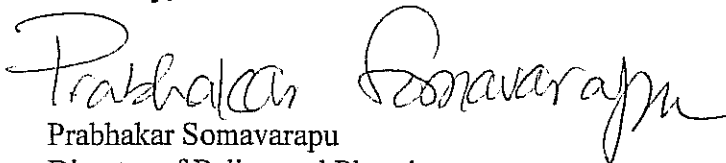
without any meaningful improvement in receiving water quality. Alternatively, with composite sampling, a more reasonable design approach can be taken.

We request the following change:

- **MRP pg E-6, Item IV.A.1** – The sampling type for Ammonia, Nitrate, and Nitrite is currently grab as listed in Table E-3a. SRCSD requests that TKN be listed as grab also, consistent with the SRCSD October 5, 2011 letter, but a footnote be added to all nitrogenous species (Ammonia, Nitrate, Nitrite and TKN) indicating that composite samples will be collected effective 1 December 2020 or upon compliance with Special Provisions VI.C.7.b. In the interim, SRCSD will continue to use grab sampling for nitrogenous species and will resolve composite sample collection logistics with the nitrogenous species.

We request that this additional change to require composite sampling of the nitrogenous species effective 1 December 2020 be made to the Monitoring and Reporting Program. If there are any questions on these additional comments, please contact Robert Seyfried at seyfriedr@sacsewer.com or 916-876-6068.

Sincerely,



Prabhakar Somavarapu
Director of Policy and Planning

cc: James Marshall, CVRWQCB
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